

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ELIZABETH DE COSTER, *et al.*, on behalf of  
themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:21-cv-00693-JHC

STIPULATED MOTION AND  
ORDER REGARDING SEALING  
OF SUPPLEMENTAL MOTION TO  
COMPEL BRIEFING

DEBORAH FRAME-WILSON, *et al.*, on behalf  
of themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:20-cv-00424-JHC

CHRISTOPHER BROWN, *et al.*, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:22-cv-00965-JHC

STIP. MOT. & ORDER

RE SEALING OF SUPP. MTN. TO COMPEL BRIEFING

(No. 2:21-cv-00693-JHC; No. 2:20-cv-00424-JHC; No. 2:22-cv-00965-JHC)

1 The Parties have met and conferred with respect to the upcoming supplemental briefing  
2 on Plaintiffs' Motion to Compel, and anticipate that their briefs, declarations, and exhibits will  
3 quote from and/or describe in detail a significant amount of information that has been designated  
4 as Confidential or Highly Confidential-Attorneys' Eyes Only by Amazon. Accordingly, in order  
5 to ensure that such materials are treated appropriately under the applicable protective order, and  
6 to reduce burdens on the Court, the Parties, pursuant to LCR 7(d)(1) and 10(g), and their  
7 respective counsel, hereby stipulate and agree to the following procedure for filing and sealing in  
8 connection with the supplemental motion to compel briefing, subject to the Court's approval.

9 1. Pursuant to LCR 5(g)(2), each Party will provisionally file under seal its  
10 supplemental brief, declarations, exhibits, and all other evidence and declarations on which that  
11 Party relies (collectively, "Supplemental Papers") which contain material designated  
12 Confidential or Highly Confidential-Attorneys' Eyes Only by Amazon.

13 2. Within two weeks of the filing of the Parties' Supplemental Papers, pursuant to  
14 LCR 5(g), the Parties will meet and confer and, as appropriate, file (1) public versions of their  
15 Supplemental Papers, with necessary redactions, and (2) corresponding motion(s) to seal  
16 pursuant to LCR 5(g)(3). The Party seeking to maintain material under seal (or under redaction)  
17 shall be the movant for purposes of any such motion(s) to seal associated with the Parties'  
18 Supplemental Papers.

19 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.  
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DATED December 9, 2024.

Respectfully submitted,

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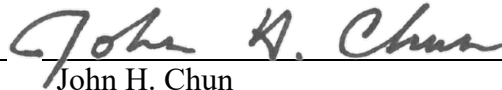
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*Attorneys for Defendant Amazon.com, Inc.*

1 IT IS SO ORDERED.

2  
3 December 9, 2024

4 Dated



John H. Chun

United States District Judge

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STIP. MOT. & ORDER

RE SEALING OF SUPP. MTN. TO COMPEL BRIEFING - 4

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